

FILED

JAN 21 2015

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GAIL AMAN,

Defendant.

4:15CR00019 CDP/SPM

No.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

[Theft of Government Funds]

From on or about March 1, 2013 until on or about November 1, 2013, in St. Louis County
in the Eastern District of Missouri, the defendant,

GAIL AMAN,

willfully and knowingly did steal and purloin and convert to her own use money belonging to the
United States with an aggregate value of \$1,000.00 or more, to wit, Supplemental Security Income
("SSI") with an aggregate value of \$63,165.00, all as part of a single scheme and plan by which the
defendant obtained benefits in an amount in excess of that to which she was legally entitled by
failing to declare cash income she received independently of SSI benefits.

All in violation of 18 U.S.C. § 641 ,

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in Count I, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes, or is derived from proceeds traceable to said violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

3. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to

Title 21, United States Code, Section 853(p).

A TRUE BILL.

RICHARD G. CALLAHAN
United States Attorney

FOREPERSON

GWENDOLYN E. CARROLL
Assistant United States Attorney